## Case: 1:20-cv-01622-JG Doc #: 14-2 Filed: 09/03/20 1 of 1. PageID #: 588

## UNSWORN DECLARATION UNDER PENALTY OF PERJURY

I, Jeane' Holley, hereby make the following declaration under 28 U.S.C. § 1746:

- 1. I am the Deputy Director for Regional Collaboration and, in this role, I am responsible for processing complaints filed with the Human Rights Commission. I have held this position since March 1, 2019
- 2. I am over eighteen years of age and of sound mind. The facts contained in this declaration are based upon my personal knowledge.
- 3. I am familiar with all complaints that have been submitted to the Human Rights Commission and am the custodian of these records.
- 4. The Human Rights Commission has not received any complaints against Kristi Stokes or Covenant Weddings, LLC concerning a violation of any provision of Chapter 1501 of the Cuyahoga County Ordinances, including §1501.02(C).
- 5. The Human Rights Commission has not enforced any provision of Chapter 1501 of the Cuyahoga County Ordinances, including §1501.02(C), against Kristi Stokes or Covenant Weddings, LLC.
- 6. The Human Rights Commission has never enforced any provision of Chapter 1501 of the Cuyahoga County Ordinances, including §1501.02(C), against a minister or any other religious person authorized to solemnize marriages for refusing to marry or provide wedding services to same-sex couples.
- 7. The Human Rights Commission has never enforced any provision of Chapter 1501 of the Cuyahoga County Ordinances, including §1501.02(C), against any religious entity or organization for refusing to marry or provide wedding services to same-sex couples.
- 8. The Humans Rights Commission has never received a complaint from the public that a minister or other religious person authorized to solemnize marriages violated Chapter 1501 of the Cuyahoga County Ordinances, including §1501.02(C), for refusing to marry or provide wedding services to a same-sex couple.
- 9. The Human Rights Commission has never received a complaint from the public that a religious entity or organization refused to marry or provide weddings services to same-sex couples in violation of Chapter 1501 of the Cuyahoga County Ordinances, including \$1501.02(C).
- 10. I declare the above to be true under penalty of perjury of the laws of the United States of America.

Jenae Holley

Date: September 3, 2020